

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

FN HERSTAL, S.A., and)
FN AMERICA, LLC,)
)
Plaintiffs,)
v.) Civil Action No.: 1:24-cv-218-LCB-JEP
)
STURM, RUGER & CO., INC.,)
)
Defendant.)

**JOINT MOTION FOR ENTRY OF A
STIPULATED PROTECTIVE ORDER**

Pursuant to Rule 26 of the Federal Rules of Civil Procedure, all parties to this action - Plaintiffs FN Herstal, S.A. (“FNH”) and FN America, LLC (“FNA”) (collectively “Plaintiffs” or “FN”), and Defendant Sturm, Ruger & Co., Inc. (“Defendant” or “Ruger”) (collectively, the “Parties”) – jointly move the Court for entry of the Stipulated Protective Order attached to this motion.

In Support of this Motion, the Parties state further as follows:

1. During discovery in this action, the Parties may be required to produce information that constitutes, in whole or in part, protected information such as trade secrets, non-public research and development, commercial or financial information, or other information that may cause harm to the producing party or a non-party and that is ordinarily maintained in confidence.

2. The Parties seek to limit the disclosure of the information and documents to protect the Parties to this litigation as well as third parties from unnecessary dissemination of such information as well as to maintain the confidentiality of certain information.

3. The Parties believe that good cause exists for discovery in this action to be conducted under a protective order pursuant to Rule 26(c)(1) of the Federal Rules of Civil Procedure.

4. The Parties believe that the Court's entry of the attached Protective Order is in the best interests of the Parties and will promote the proper administration of this litigation.

WHEREFORE, the Parties respectfully request that the Court adopt the Protective Order attached hereto.

Respectfully submitted, this the 27th day of June, 2024.

WILLIAMS MULLEN, P.C.

By: s/Robert C. Van Arnam
Robert C. Van Arnam, NC 28838
Andrew R. Shores, NC 46600
301 Fayetteville Street, Suite 1700
Raleigh, NC 27601
Telephone: (919) 981-4055
Facsimile: (919) 981-4300
Email: rvanarnam@williamsmullen.com
Email: ashores@williamsmullen.com

Attorneys for Plaintiffs

**NELSON MULLINS RILEY &
SCARBOROUGH LLP**

By: s/Lorin J. Lapidus
Lorin J. Lapidus, NC 33458
380 Knollwood Street, Suite 530
Winston Salem, NC 27103
Telephone: (336) 774-3329
Facsimile: (336)774-3299
Email: lorin.lapidus@nelsonmullins.com

**FINNEGAN, HENDERSON,
FARABOW, GARRETT & DUNNER,
LLP**

Douglas A. Rettew (*pro hac vice*)
Patrick J. Rodgers (*pro hac vice*)
901 New York Avenue, NW
Washington, DC 20001-4413
Telephone: (202) 408-4000
Facsimile: (202) 408-4400
Email: doug.rettew@finnegan.com
Email: patrick.rodgers@finnegan.com

R. Gordon Wright (*pro hac vice*)
271 17th Street, NW
Suite 1400
Atlanta, GA 30363-6209
Telephone: (404) 653-6400
Facsimile: (404) 653-6444
Email: gordon.wright@finnegan.com

Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on June 27, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send electronic notification of such filing to all counsel of record.

s/ Robert C. Van Arnam

Robert C. Van Arnam, NC State Bar No. 28838

Andrew R. Shores, NC State Bar No. 46600

WILLIAMS MULLEN, P.C.

301 Fayetteville Street, Suite 1700

Raleigh, NC 27601

Telephone: (919) 981-4055

Facsimile: (919) 981-4300

rwanArnam@williamsmullen.com

ashores@williamsmullen.com